

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SONRAI SYSTEMS, LLC,

Plaintiff,

vs.

ANTHONY M. ROMANO, GEOTAB, INC., and
HEIL CO. D/B/A ENVIRONMENTAL
SOLUTIONS GROUP,

Defendants.

Case No. 1:16-cv-03371

Hon. Thomas M. Durkin

Magistrate Judge Jeannice W. Appenteng

PLAINTIFF’S UNOPPOSED MOTION TO FILE DOCUMENTS UNDER SEAL

Plaintiff, Sonrai Systems, LLC (“Plaintiff” or “Sonrai”), by and through its counsel, requests leave under Local Rule 26.2 to file its summary judgment brief, statement of facts, and exhibits under seal. In support of its Motion, Sonrai states as follows:

1. As part of its motion for summary judgment, Sonrai will be filing a number of exhibits that parties have marked Confidential or Highly Confidential or contain confidential information pursuant to the Protective Order. Sonrai’s brief in support of its motion and its statement of material facts cite to, and at times quote, those exhibits.

2. During the summary judgment conference held on June 22, 2023, the parties discussed the need to file under seal certain summary judgment papers containing similar information that a party had designated as Confidential, Highly Confidential, or contained confidential information pursuant to the Protective Order.

3. This approach was adopted by co-defendants Heil Co. (“Heil”) and Geotab Inc. (“Geotab”) without objection, and Sonrai understood that the Court approved of this approach.

4. Sonrai conferred with counsel for Defendants Anthony Romano, Heil, and Geotab about the filing of this motion. Counsel for Romano, Geotab, and Heil indicated that they do not

object to Sonrai's motion for leave to file its summary judgment brief, statement of facts, and exhibits under seal.

WHEREFORE, Sonrai respectfully requests leave to file its summary judgment brief, statement of facts, and exhibits under seal.

Dated: November 20, 2023

/s/ J. Scott Humphrey

J. Scott Humphrey

Katie Burnett

Samantha Roth

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Attorneys for Sonrai Systems, LLC

CERTIFICATE OF SERVICE

The undersigned certifies that on November 20, 2023, he served a copy of the foregoing on all counsel of record via electronic case filing procedures.

/s/ J. Scott Humphrey
One of the Attorneys for Plaintiff